

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

UNITED STATES OF AMERICA

VS.

RICARDO QUINTANILLA, et. al.

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§

Criminal No. 7:19-cr-00522-1

**UNOPPOSED MOTION TO TRAVEL OUTSIDE
OF THE SOUTHERN DISTRICT OF TEXAS**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, RICARDO QUINTANILLA, Defendant in the above entitled and numbered cause, and requests the Court's permission to travel outside of the Southern District of Texas, McAllen Division and for good cause shows the following:

I.

Defendant is currently restricted to travel throughout the Southern District. Defendant's daughter is a graduating senior at Weslaco East High School and a member of the school band. The band is taking a senior trip to Disney World in Orlando, Florida. Defendant respectfully requests permission to travel to Orlando on Wednesday, June 9th, 2019, through Saturday, June 15th, 2019, to accompany his daughter as a chaperone along with several other parents.

II.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully prays that this Court grant him these days to travel outside the Southern District of Texas McAllen Division as requested.

Respectfully submitted,

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By: /s/ Jaime Peña

JAIME PEÑA

State Bar No. 90001988

CERTIFICATE OF CONFERENCE

This is to certify that prior to the filing of the foregoing motion that the undersigned defense counsel conferred with Assistant United States Attorney in regard to this motion. The Government indicated that it is not opposed to the motion.

/s/ Jaime Peña

JAIME PENA

CERTIFICATE OF SERVICE

I, Jaime Peña, hereby certify that a copy of the above and foregoing Motion has been electronically delivered to the Assistant United States Attorney, United States Attorney's Office, 1701 West Business Highway 83, McAllen, Texas on this 30th day of May, 2019.

/s/ Jaime Peña

JAIME PENA